REMARKS

The title has been updated to "Manual Adjacencies Alternate Routing". Also, the last paragraph of col. 1 has been clarified to **"See figure 2 from the ISO 10589 document referenced below** for the use of these levels and the general environment of this protocol".

Regarding the obviousness rejection, the Examiner admitted that various claimed features were missing in Mazzola. In addition to those missing features, there are many other features that Mazzola does not disclose.

For example, Mazzola does ***not*** disclose a plurality of intermediate systems (IS) divided between at least one non IS-IS area and at least one IS-IS area. While Mazzola describes a routing process, it relates to networks using the ***same*** routing protocol, typically ES-IS. There is no disclosure of routing involving two networks using ***different*** routing protocols. Although IS-IS is mentioned as a possible routing protocol, there is no disclosure of using this with a different routing protocol (i.e., a non-IS-IS area). In fact, as noted by the Examiner, at column 6, line 12 of Mazzola: "*if a network element in the network does not support this protocol, it will not receive messages routed in accordance with the invention*".

Furthermore, there is ***no*** disclosure of a plurality of connections between the IS-IS area and the non-IS-IS area, as required in the subparagraph (b) of claim 1. Similarly, there is ***no*** disclosure of a plurality of manual adjacencies at one of the intermediate systems in the IS-IS area identifying routes to one network equipment within the non-IS-IS area, as required by subparagraph © of claim 1. The disclosure of selective routing in the prior art discussion does ***not*** suggest a plurality of manual adjacencies. Furthermore, as noted by the Examiner, there is ***no*** disclosure of the features in subparagraph (d) of claim 1.

Farris discloses a signaling architecture for multiple switched telephone networks using a common packet switch data network. There is ***no*** mention that either the telephone or the data networks in Farris be SDH-based.

Furthermore, the use of the spanning tree algorithm does ***not*** correspond with the features of subparagraph (d) of claim 1. For example, the spanning tree algorithm blocks certain ports on network elements within the tree structure in order to avoid looping. However, it does ***not*** remove identifications of neighboring network elements, as required by claim 1.

Furthermore, the port blocking of the spanning tree algorithm is not in response to broken connections, as required by claim 1. In contrast, broken connections may result in the spanning tree algorithm unblocking a previously blocked port and using this as the preferred route. This is ***contrary*** to the teaching of the present application.

More generally, as noted above, the combination of Mazzola and Farris fails to disclose a number of the features required by claim 1. It is, therefore, difficult for the applicant to see how the person of ordinary skill in this art could arrive at the present invention by combining these two references.

Furthermore, Mazzola and Farris are incompatible, since Mazzola relates to routing within networks having the same routing protocol, whereas Farris relates to controlling two networks using similar protocols but by using a third network having a different protocol. Again, it is difficult to see how the skilled person could combine these two disparate routing technologies.

It is, therefore, respectfully submitted that claim 1 is non-obvious over the combination of Mazzola and Farris, and that claim 2 shares in the allowability of claim 1.

Wherefore, a favorable action is earnestly solicited.

Respectfully submitted,

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